

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

LEONARD ROLLINS, et al.,  
Plaintiffs,

vs.

TRAYLOR BROS., INC., and  
TRAYLOR/FRONTIER-KEMPER JV,  
Defendants.

NO. 2:14-cv-1414 JCC

**[PROPOSED] ORDER GRANTING  
PLAINTIFFS' MOTION FOR  
CLASS CERTIFICATION**

**NOTED: July 31, 2015**

THIS MATTER, having come on regularly before the Court on the Plaintiffs' Motion for Class Certification and the Court having reviewed and considered the files and records herein and heard the arguments in this matter, the Court finds as follows:

1. The proposed class is so numerous that joinder is impracticable;
2. There are numerous issues of fact and law common to the class;
3. The claims of the Named Plaintiffs are typical of those of the proposed class;
4. The named Plaintiffs are adequate class representatives;

The Court further finds that certification under Fed. R. Civ. P. 23(b)(3) is appropriate because:

5. Questions of law or fact common to class members predominate over any questions affecting only individual members;
6. A class action is superior to other available methods for fairly and efficiently adjudicating the controversy;

Accordingly, the Court orders as follows:

**[PROPOSED] ORDER 2:14-cv-1414 JCC - 1**

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1 It is hereby ORDERED, ADJUDGED AND DECREED that Plaintiffs' Motion for Class  
2 Certification is hereby GRANTED.

3 IT IS SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2015.

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6 \_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

7 Presented by:

8 **TELLER & ASSOCIATES PLLC**

9  
10 By: 

11 Stephen A. Teller, WSBA #23372

12 Gregory A. Hitzel, WSBA #39348

13 ATTORNEYS FOR PLAINTIFFS  
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